

	AIR QUALITY DIVISION POLICY AND PROCEDURE		DEPARTMENT OF ENVIRONMENTAL QUALITY
Original Effective Date: November 25, 1996 Revised Date: February 14, 1997 Reformatted Date: January 29, 2014	Subject: Criteria Pollutant Threshold Levels For The Point Source Emissions Inventory		Category: <input type="checkbox"/> Internal/Administrative <input checked="" type="checkbox"/> External/Non Interpretive <input type="checkbox"/> External/Interpretive
	Program Name: Emissions		
	Number: AQD-013	Page: 1 of 5	

A Department of Environmental Quality (DEQ) Policy and Procedure cannot establish regulatory requirements for parties outside of the DEQ. This document provides direction to DEQ staff regarding the implementation of rules and laws administered by the DEQ. It is merely explanatory; does not affect the rights of, or procedures and practices available to, the public; and does not have the force and effect of law.

INTRODUCTION:

Michigan Air Pollution Control Rule 336.1202 (Rule 2) requires an annual report from a commercial, industrial, or governmental source of emission of an air contaminant, if in the judgment of the DEQ, information on the quantity and composition of an air contaminant emitted from the source is considered by the DEQ as necessary for the proper management of the air resources. In addition, Air Pollution Control Rules 336.1208a (Rule 208a) and Rule 336.1212 (Rule 212) contain emission reporting requirements.

In the past, nearly every permitted source was added to the point source emissions inventory (point inventory). In addition, many sources without permits (grandfathered) were included. The point inventory source population peaked in 1994 with over 14,000 sources. A considerable effort has been put into improving the quality of the data in the point source emissions inventory and through implementation of this policy over the years since it was first adopted. As a result, the 2012 point inventory contains approximately 1700 sources.

This policy and procedure is intended to provide guidance to Air Quality Division (AQD) staff as to what sources should be included in the point inventory. The goal is to include: (1) sources that are specifically required to report emissions or compliance status in accordance with an Air Pollution Control Rule or federal Clean Air Act (CAA) requirement; (2) sources that are determined to be a Category I or Category II fee-subject facility; (3) sources that have obtained and are operating under an "Opt-out Permit"; and (4) sources that emit sufficient quantities of air contaminants to warrant their inclusion in the point inventory for the proper management of the air resources and support the State Implementation Plan (SIP).

AUTHORITY:

The federal CAA, 42 United States Code (U.S.C.) 7401; the Part 55, Air Pollution Control, Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

STAKEHOLDER INVOLVEMENT:

Air Advisory Council

AIR QUALITY DIVISION
POLICY AND PROCEDURE

Number: AQD-013

Subject: Criteria Pollutant Threshold Levels For The Emissions Inventory

Page 2 of 5

DEFINITIONS:

Emission, Reporting & Assessment Unit (ERAU) – A unit in the Air Quality Evaluation Section of AQD responsible for overseeing emissions reporting.

Michigan Air Emissions Reporting System (MAERS) – Currently, a web-based application for reporting annual emission reports by sources required to report pursuant to Rule 212. The data submitted to MAERS is the basis for the AQD's point inventory.

State Registration Number (SRN) – A unique identifier used by the AQD to identify single stationary sources.

Environmental Assistance Center (EAC) – Located in the DEQ, Office of Environmental Assistance (OEA) and provides direct one-on-one assistance or a referral to program staff within DEQ.

Opt-out Permit – A permit to install issued to a source which establishes emission and operational limits, enforceable by the AQD and/or the United States Environmental Protection Agency (USEPA), to reduce a source's potential to emit to below the major source thresholds and therefore allows the source to avoid the requirements of the Renewable Operating Permit (ROP) program. {See Policy and Procedure AQD-004}

POLICY:

Sources with actual emissions expected to be greater than the following emission thresholds will be notified to report emissions annually: Carbon Monoxide = 100 tons per year (TPY), Nitrogen Oxides = 40 TPY, Sulfur Dioxide = 40 TPY, Particulate Matter (PM) = 25 TPY, PM10 = 15 TPY, Volatile Organic Compounds (VOC) = 10 TPY, and Lead (Pb) = 0.5 TPY. These thresholds are based on the significant levels defined in Air Pollution Control Rule R336.1119(e) with the exception of VOC and Pb. The VOC threshold is based on the major source definition for a single hazardous air pollutant in Section 112 of the federal CAA and the requirement to identify VOC point sources greater than 10 TPY in the SIP. The Pb threshold is based on the lead ambient monitoring requirements (40 Code of Federal Regulations (CFR) Part 58 Appendix D). In addition, sources that are specifically required to report emissions or compliance status in accordance with an Air Pollution Control Rule or federal CAA requirement, sources that have an active Opt-out Permit, and sources that are considered Category I or Category II Fee-subject sources pursuant to PA 451 will be included in the point inventory.

**AIR QUALITY DIVISION
POLICY AND PROCEDURE**

Number: AQD-013

Subject: Criteria Pollutant Threshold Levels For The Emissions Inventory

Page 3 of 5

PROCEDURES:

Step	Who	Does What
Step 1 – SRN Assignment	Field Operations / Permits Section	Upon becoming aware of a source which will be of ongoing regulatory interest, requests an SRN be assigned. The request is submitted to the MAERS Coordinator and includes facility name; location of the facility, including address, city, county, and zip code; facility contact, contact's email address and telephone number.
	MAERS Coordinator	Verifies the address / facility does not already have an SRN assigned, and issues an SRN. In accordance with the policy above, a preliminary determination is made, based on input from District Staff as to whether the source will be required to submit a MAERS report in the coming year. The MAERS Flag in the MAERS is set accordingly.
Step 2 – Master List Generation	MAERS Coordinator	During November each year, the preliminary Master List is populated with sources that have a MAERS Flag set to Y- yes or U - undecided. Once populated and quality assured, the MAERS Coordinator notifies District Staff that the Master List is available for review and approval.
Step 3 – Master List review and finalization	Field Operations / District Supervisors	Upon notification by the MAERS Coordinator, the Master List is reviewed by District Staff. Sources are added or removed based on the criteria set forth in the Policy above and in consultation with the District Supervisor.
Step 4 – Master List finalization	District Supervisors or designee	Review and approve each districts final Master List. Any sources not required to report should be removed from the Master List prior to approving each district's Master List. Any source remaining on the Master List will receive notification that they are required to complete a MAERS report. Master Lists are expected to be finalized each year by December 20 th .
Step 5 – Notification of MAERS sources	MAERS Coordinator	A minimum of 2 attempts to electronically notify (email) sources of their obligation to submit a MAERS report shall be made. Any sources that have not confirmed receipt of the electronic notifications by January 23 rd shall be processed for paper notification. All notifications shall be completed by January 29 th each year. Notifications (electronic or paper) will provide the source with the necessary resources to complete their MAERS reports in an efficient manner and are customized depending on whether or not the source 1) has reported before, and/or 2) is a Rule 208a (limits potential by registration) source.
Step 6 – Customer Service	ERAU, Field Operations, EAC	The DEQ will provide the necessary staff resources to provide sources with the assistance necessary for the source to complete and submit their MAERS reports. For the most part, this customer service will be coordinated through the MAERS Coordinator.

AIR QUALITY DIVISION
POLICY AND PROCEDURE

Number: AQD-013

Subject: Criteria Pollutant Threshold Levels For The Emissions Inventory

Page 4 of 5

Step	Who	Does What
Step 7 – Review and Audit of Submitted Reports	Field Operations	Upon submittal and prior to June 1 st , MAERS reports assigned for audit will be reviewed for errors. Sources are assigned for audit at the District Supervisors' discretion taking into account workload and resource considerations.
Step 8 – Statewide QA	ERAU	After the District Staff have completed the audits of the MAERS reports and prior to the population of next year's Master List, a statewide quality assurance of the submitted data is completed. This effort looks at the annual data as a whole and identifies data outliers and data that is beyond acceptable ranges. The ERAU will identify and correct data where the correction is obvious; the ERAU will work with District Staff and/or the source to verify or correct data where a correction is not obvious.
Step 9 – Annual Point Source Inventory Submittal to USEPA	ERAU	By January 1 st of the following year, the ERAU will finalize the point inventory and generate the files necessary to submit a facility and point inventory to USEPA's Emissions Inventory System (EIS) pursuant to 40CFR Part 52 (i.e., 2012 data is submitted to the EIS by January 1, 2014). All data submitted by a source is processed through the audit and statewide quality assurance process, and is submitted to USEPA as part of Michigan's official Point Source Emissions Inventory. The Point Source Emissions Inventory is also packaged and made available to the Great Lakes Commission and Lake Michigan Air Directors Consortium for regional planning efforts. The finalized Point Source Emissions Inventory is also made available to the general public through the MAERS Web Query and FOIA.

AIR QUALITY DIVISION
POLICY AND PROCEDURE

Number: AQD-013

Subject: Criteria Pollutant Threshold Levels For The Emissions Inventory

Page 5 of 5

This Policy and Procedure document is intended to provide guidance to AQD staff to foster consistent application of Part 55 of Act 451 and the administrative rules promulgated thereunder. This document is not intended to convey any rights to any parties nor create any duties or responsibilities under law. This document and matters addressed herein are subject to revision.

REFERENCES:

Questions regarding this policy and procedure should be directed to Tom Shanley at shanleyt@michigan.gov; or at 517-284-6761.

DIVISION CHIEF APPROVAL:



G. Vinson Hellwig, Chief
Air Quality Division